

## **REMARKS**

By this amendment, Applicants have amended the claims to more clearly define their invention. In particular, Applicants have deleted the phrases beginning with “or more preferably” from claims 1, 4, 6, 7 and 10. The preferred ranges are now recited in new dependent claims 11-21. Claim 1 has also been amended to recite that the air-impermeable resin layer is in the form of a foam or a film (see, e.g., original claim 10 and page 22, lines 2-4 of Applicants’ substitute specification) and that the adhesion area is such that resonance due to a total mass of the air-impermeable resonance layer and the sound absorption layer occurs in addition to membrane resonance of the air-impermeable resonance layer (see, e.g., page 24, line 12 (not including the Table) to page 26, line 25 of Applicants’ substitute specification). Claim 1 has also been amended to change “faces” (both occurrences) in the last two lines of the claim to --is adapted to face--. Other clarifying amendments have been made to the dependent claims and new dependent claims 22-26 added to further define the invention.

In view of the deletion of the phrases beginning with “or more preferably” from the claims, it is submitted all of the claims now in the application comply with the requirements of 35 U.S.C. 112, second paragraph. Therefore, reconsideration and withdrawal of the rejection of claims 1, 5, 6 and 10 under 35 U.S.C. 112, second paragraph, are requested.

Claims 1, 5, 6 and 10 stand rejected under 35 U.S.C. 102(b) as anticipated by or, in the alternative, under 35 U.S.C. 103(a) as obvious over

U.S. Patent No. 4,966,799 to Lucca et al. Applicants traverse this rejection and request reconsideration thereof.

The present invention relates to an ultra-light sound insulator. The ultra-light sound insulator of the present invention includes a sound absorption layer that is light in weight and has a thickness in a range of 1-100 mm in a density in the range of 0.01 to 0.2 g/cm<sub>3</sub>. An air-impermeable resonance layer in the form of a foam or a film is bonded to the sound absorption via an adhesive layer and has an area-weight of not greater than 600 g/m<sup>2</sup>. Applicants choose the adhesion strength and adhesion area of the adhesive layer to provide a particular resonance. That is, the adhesion strength of the adhesive layer against the sound absorption layer and the air-impermeable resonance layer is set in a range of 1-20 N/25 mm under conditions of an peel angle 180° and a peel width of 25 mm while an adhesion area of the adhesive layer is 50-100% of a whole interface between the sound absorption layer and the air-impermeable resonance layer. This provides a sound insulator in which resonance due to a total mass of the air-impermeable resonance layer and the sound absorption layer occurs in addition to the membrane resonance of the air-impermeable resonance layer. In the ultra-light sound insulator of the present invention, the sound absorption layer is adapted to face a vehicle body panel while the air-impermeable resonance layer is adapted to face a vehicle interior. Such an ultra-light sound insulator is not disclosed in Lucca et al.

In the first place, the ultra-light sound insulator of the present invention uses an air-impermeable resonance layer that has a low area weight.

The air-impermeable resonance layer of the present invention has an area-weight of not greater than  $600 \text{ g/m}^2$  ( $= 0.6 \text{ Kg/m}^2$ ). On the other hand, the supporting layer of Lucca has more than double of the area-weight of the ultra-light sound insulator of the present invention as explained hereinafter.

The Lucca et al. patent discloses that the supporting layer has an density of 1.5 to 2.5  $\text{Kg/l}$  ( $= 1.5 \text{ to } 2.5 \text{ Kg/dm}^3 = 1500 \text{ to } 2500 \text{ kg/m}^3$ ) ( $1\text{dm} = 1/10 \text{ m}$ ,  $1\text{dm}^3 = 1/1000 \text{ m}^3$ ) and a thickness of 1 to 10 mm (see column 3, lines 41-44, column 4, lines 1 - 5, and claim 8 of Lucca et al.). The area-weight thereof is thus calculated to be  $1.5 \text{ to } 2.5 \text{ Kg/m}^2$  when the thickness is 1 mm, and 15 to 25  $\text{Kg/m}^2$  when the thickness is 10 mm. Accordingly the area-weight of the supporting layer is calculated to be 1.5 to 25  $\text{Kg/m}^2$ .

In addition, the air-impermeable resonance-layer of the present invention is either a foam or a film and the adhesion strength of the adhesive layer of the present invention is set in a range of 1 to 20 N/25 mm and adhesion area of the adhesive layer is 50 to 100% of a whole interface between the sound absorption layer and the air-impermeable resonance layer.

On the other hand, in Lucca et al., the supporting layer (12, 23, 32) is “rigid or solid” and the adhesion strength of the adhesive layer is not disclosed. The supporting layer 12 in Fig. 1 is a solid sheet of a thermoformable plastic material (see column 2, lines 50 to 52). Supporting layer 23 in Fig. 2 is polypropylene containing a mineral filler (see column 2, line 68 to column 3, line 2). The supporting layer 32 in Fig. 3 is glass fiber-reinforced heat-setting material (see column 3, lines 13 to 15).

A solid sheet of a thermoplastic or heat-setting material can be used for the supporting layer. In order to increase the mechanical strength of the supporting layer, a glass fiber-reinforced thermoplastic material can be used. Vulcanizable rubber is also suitable as a supporting layer (see column 4, lines 1 - 12). These materials are classified as heavy-weight sound insulating materials in the conventional resonance theory.

In Lucca et al., adhesive strength and adhesive area of adhesive layers 15, 27, 35 against the supporting layers 12, 23, 32 are unclear. In general, an adhesive layer is not used or an adhesive layer having a small adhesive strength is used in an ultra-light sound insulator having a similar weight as the present invention. The lighter the sound insulator is, the simpler the adhesion method with less amount of adhesive material chosen in order to simplify the production process and to reduce the production cost. Thus an adhesion strength of less than 1 N/25mm and an adhesion area of not more than 20% are usually adopted for such an ultra-light sound insulator.

If the heavy-weight sound insulator disclosed in Lucca et al. is to be applied to a conventional ultra-light sound insulator, a person of ordinary skill in the art would have reason to adopt an insulator without an adhesive layer or adopt an adhesive layer having a minimum strength to prevent the supporting layer from dropping off the sound absorption layer.

On the other hand, the values of adhesion strength and adhesion area of the ultra-light sound insulator of the present invention are larger than values of a typical ultra-sound insulator and beyond the value range of the conventional conception. The minimum value of adhesion strength of 1 N/25

mm of the present invention is still larger than usually anticipated range values. Adhesion with the maximum value of 20 N/25 mm is a fairly strong adhesion and would not have been contemplated by one of ordinary skill in the art.

The resonance mechanism in Lucca et al. is also different from the resonance mechanism of the present invention.

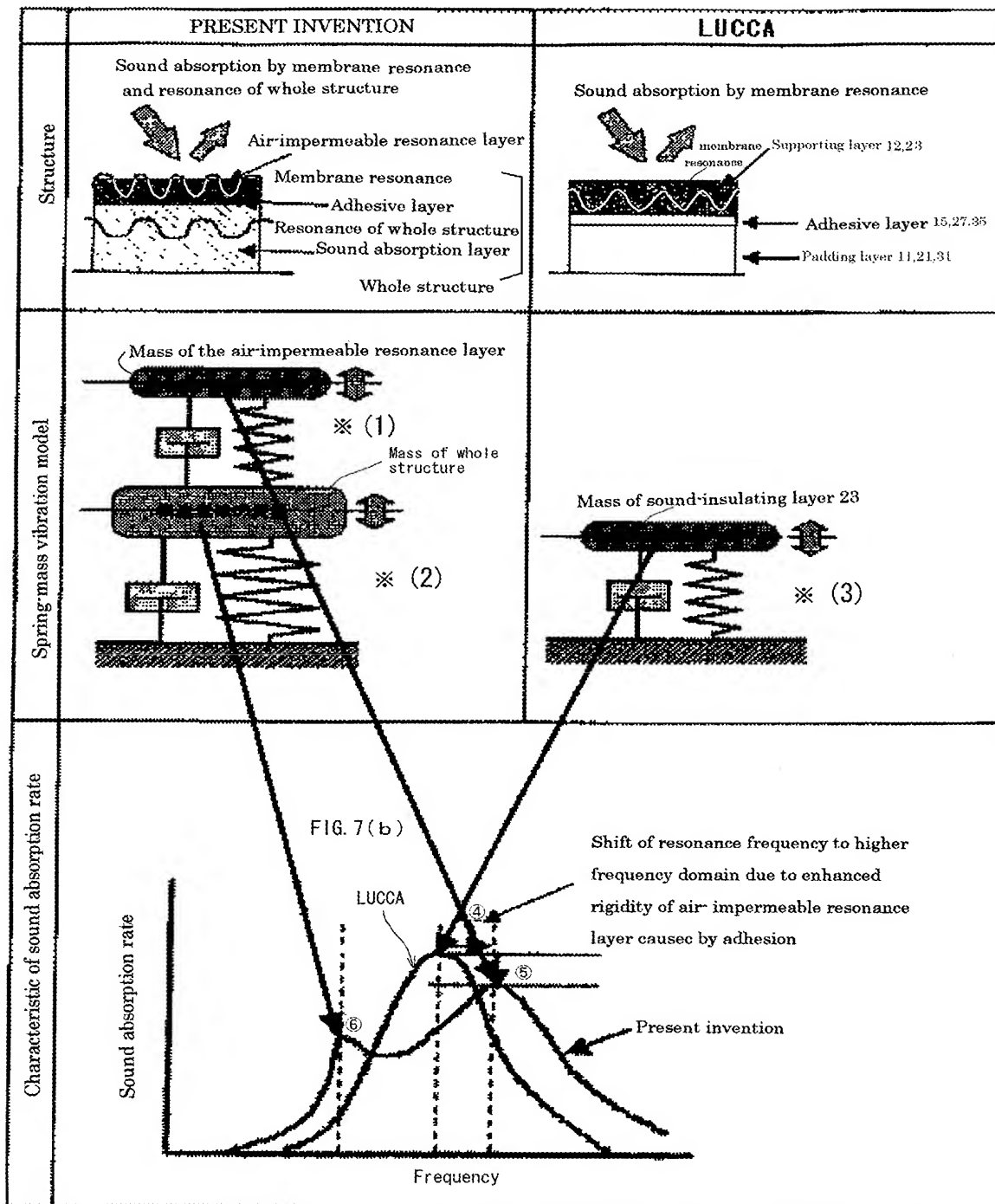
Considering the area-weight and materials of the supporting layer, the resonance mechanism of Lucca is the same as the mechanism of the prior art listed in the specification of the present invention (shown in Figs. 27, 28, 29 of the present application), with both adopting a sound insulation theory.

To the contrary, the inventors of the present invention assume a spring-mass vibration model for the present invention.

In a spring-mass vibration model (A) membrane vibration of the air-impermeable resonance layer ascribed to the mass of the air-impermeable resonance layer alone and an air spring in the sound absorption layer, and (B) vibration of the whole structure (including the air-impermeable resonance layer and the sound absorption layer) ascribed to the total mass of the air-impermeable resonance layer and the sound absorption layer and the air spring in the sound absorption layer are combined,

A spring-mass vibration model is defined as a model in which a mass part fixed at an end of a spring is vibrated by the spring.

The following table of figures illustrates the differences between the present invention and Lucca et al.



- (1) Spring-mass resonance (membrane resonance) ascribed to air-spring in sound absorption layer and mass of air-impermeable resonance layer
- (2) Spring-mass resonance (non-membrane resonance) ascribed to air-spring in sound absorption layer and total mass of sound absorption layer and air-impermeable resonance layer
- (3) Air spring constant of supporting layer 11,21,31 which corresponds to the air spring constant in sound absorption layer of the present invention

The spring-mass vibration model is explained from page 23, line 14 to page 27, line 17, particularly in page 25, line 12 to page 26, line 25 of Applicants' substitute specification, and is shown in Fig. 5(a) and (b) and Fig. 7(a) and (b) of the present application.

"Resonance" in the above table is defined as a phenomenon in forced vibration of a vibration system in which response against an external force such as displacement, velocity, and pressure is maximized at the vicinity of the natural frequency (resonance frequency) of the system as the frequency of the forced vibration is changed with the external force kept constant.

"External force" here corresponds to reflected noise in the vehicle interior described at page 5, lines 13-27 of Applicants' substitute specification. As described therein, the frequency domain of 800 to 1600 Hz is essential for the cleanness of conversation. It is also described that the prior art structure, such as that of Lucca et al., has insufficient sound absorption effects at the frequency of about 1000 Hz. Furthermore, as described at page 6, line 21 to page 7, line 5 of Applicants' substitute specification. The prior art structure has a poor sound absorption in a frequency domain of 315 to 800 Hz.

As shown in the above table, the sound absorption layer is bonded to the air-impermeable resonance layer via an adhesive layer. By "regulating", or tuning the adhesive area and adhesive strength of the adhesive layer, resonance (B) ascribed to the total mass of the air-impermeable resonance layer and the sound absorption layer is induced, while resonance frequency of resonance (A) ascribed to the mass of the air-impermeable resonance layer is shifted to higher frequency domain.

Such a phenomenon does not occur by simply bonding a sound absorption layer to an air-impermeable resonance layer via an adhesive layer as in Lucca et al. The word "resonance" does not appear at all in the specification of Lucca et al. No resonance conditions, especially, no adhesive conditions are disclosed by Lucca et al. While the Examiner alleges that the adhesive layer of Lucca et al. has an adhesive area of 100 % based on the figures, the figures of Lucca et al. merely show the adhesive layer in a schematic manner. Adhesive conditions are not identified in the text at all. Accordingly, citing the figures as a basis for this rejection is unreasonable.

Transmission loss is enhanced by the resonance (A) and (B). Reduction of the transmission loss is decreased in the high frequency domain, where transmission loss is high (see (5) in Fig. 7(a)). Total reduction of the transmission loss is thus decreased considering the all frequency domains in Fig. 7(a). Although transmission loss is reduced in low frequency domain (see (6) in Fig. 7(a)), the value of transmission loss itself is small there, so the reduction there does not greatly affect the total value.

The peak of resonance (B) appears in low frequency domain (see (6) in Fig. 7(b)). The sound absorption rate in the low frequency domain, where it was difficult to raise sound the absorption rate, can thus be enhanced.

The peak of resonance (A) in the high frequency domain is shifted to higher frequency domain compared to that of Lucca et al. (see (4) in Fig. 7(b)). The sound absorption rate is slightly reduced by this (see Fig. 7(b)(5)). However, the width of the wavy shape of the curve, namely the range of the



frequency, is widened as a whole, and the sound absorption rate is thus enhanced as a whole.

In the present invention, two peaks appear in the sound absorption rate curve and the characteristic of transmission loss is changed due to the resonances (A) and (B) described above.

Even if the resonance (A) can be expected in Lucca et al., peak of Lucca et al. does not appear at optimum frequency. Moreover, Lucca et al. patent neither discloses nor suggests that resonance (B) is induced. The Lucca et al. patent also neither discloses nor suggests measurement data on the sound absorption rate and transmission loss.

The sound absorption rate and transmission loss have properties opposing each other. That is, the transmission loss is deteriorated when the sound absorption rate is ameliorated, while sound absorption rate is deteriorated when the transmission loss is ameliorated. In the field of ultra-light sound insulators, this was a tricky problem to be resolved.

The present invention is based on an idea which is clearly different from the conventional idea based on the conventional spring-mass theory (rigid body theory).

In the present invention, based on the observation that two peaks of different frequencies appear due to two kinds of resonances (A) and (B), the inventors tuned spring, mass, and adhesion strength and adhesion area of the adhesion layer, in order to obtain balanced optimum combinations of sound absorption rate and transmission loss.

This makes tuning of both the sound absorption rate and the transmission loss possible at any desired frequency band from low frequency domain to high frequency domain (see page 25, line 12 to page 26, line 24 of Applicants' substitute specification). Such is neither disclosed by or obvious over Lucca et al.

For the foregoing reasons, the ultra-light sound insulator of the present invention is clearly not disclosed by Lucca et al. and would not have been obvious over Lucca et al. Therefore, reconsideration and withdrawal of the rejection of claims 1, 5, 6 and 10 over Lucca et al. are requested.

In view of the foregoing amendments and remarks, favorable reconsideration and allowance of all the claims now in the application are requested.

Please charge any shortage in the fees due in connection with the filing of this paper, including extension of time fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No. 01-2135 (Case: 1089.45436X00), and please credit any excess fees to such deposit account.

Respectfully submitted,

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